

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, : **NOTICE OF MOTION**
 :
 v. : **05 Cr. 00004 (WHP)**
 :
 WILLIAM GENOVESE, :
 :
 Defendant. :
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PLEASE TAKE NOTICE, that upon the accompanying (1)
Declaration of **SEAN HECKER, ESQ.** and (2) Memorandum of Law, the
defendant herein, **WILLIAM GENOVESE**, will move this Court, before
the Honorable William H. Pauley, United States District Judge for
the Southern District of New York, on a date to be determined,
for an Order, pursuant to Rule 12 of the Federal Rules of
Criminal Procedure, dismissing the Indictment and granting such
other relief as the Court may deem just and proper.

Dated: New York, New York
March 16, 2005

Respectfully submitted,

LEONARD F. JOY, ESQ.
The Legal Aid Society
Federal Defender Division

By: _____
SEAN HECKER, ESQ.
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